

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Group recognise that modern slavery and human trafficking is a violation of fundamental human rights and is contrary to the Modern Slavery Act 2015 (the "Act").

The Group have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

The Group will take steps to ensure that modern slavery and human trafficking are not taking place in its own business, or within any of its supply chain. This will be achieved by ensuring that:

- ✘ All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards,
- ✘ The requirements and expectations made of the supply chain in relation to the Act will be clearly communicated and included within any contractual terms issued to them,
- ✘ Suppliers will be expected to comply with the Immigration, Asylum and Nationality Act 2006, and must comply and act in accordance with this Policy,
- ✘ The Group will take a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates,
- ✘ The Group will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

This policy applies to all persons working for us, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Every Group employee has an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices. We consider a breach of this Policy as a serious offence, and any violation of this Policy, or the Act by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition we will notify the relevant authorities of an individual, or a supplier's contravention of the Act.

This Policy will be reviewed annually to ensure that it reflects current legislation and regulations.

A P Rimoldi
Group Chief Executive
February 2020